

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:

STREAM TV NETWORKS, INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 23-10763 (MDC)

STREAM TV NETWORKS, INC. and
TECHNOVATIVE MEDIA, INC.,

Plaintiffs,

v.

SHADRON L. STASTNEY, SLS HOLDINGS
VI, LLC, HAWK INVESTMENT HOLDINGS
LIMITED, ARTHUR LEONARD ROBERT
“BOB” MORTON, SEECUBIC, INC.,
ALASTAIR CRAWFORD, KRZYSZTOF
KABACINSKI, KEVIN GOLLOP, ASAF
GOLA, JOHN DOE(S),

Defendants.

Adv. Case No. 23-00057 (MDC)

**DECLARATION OF STEVEN L. CAPONI IN SUPPORT OF
DEFENDANTS HAWK INVESTMENT HOLDINGS LIMITED AND
ARTHUR LEONARD ROBERT MORTON’S MOTION TO DISMISS
PLAINTIFFS’ COMPLAINT FOR LACK OF PERSONAL JURISDICTION,
FAILURE TO OBTAIN SERVICE, AND FAILURE TO STATE A CLAIM**

I, Steven L. Caponi, declare as follows:

1. I am an attorney with the law firm of K&L Gates LLP. I am counsel for defendants Hawk Investment Holdings Limited and Arthur Leonard Robert Morton in the above captioned matter.

¹ The Debtors, along with the last four digits of the Debtors’ federal tax identification numbers, are Stream TV Networks, Inc. (4092) and Technovative Media, Inc. (5015). The location of the Debtors’ service address is 2009 Chestnut Street, 3rd Floor, Philadelphia, PA 19103.

2. I make this declaration in support of *Defendants Hawk Investment Holdings Limited and Arthur Leonard Robert Morton's Motion to Dismiss Plaintiffs' Complaint for Lack of Personal Jurisdiction, Failure to Obtain Service, and Failure to State a Claim.*

3. Attached as Exhibit 1 is a true and correct copy of the Verified Complaint for Declaratory Relief Pursuant to 8 *Del. C.* § 225, filed in *Hawk Investment Holdings, Ltd. v. Stream TV Networks, Inc.*, No. 2022-0930-JTL (Del. Ch. 2022) (the "225 Action").

4. Attached as Exhibit 2 is a true and correct copy of the Stipulation and [Proposed] Pretrial Order entered in the 225 Action.

5. Attached as Exhibit 3 is a true and correct copy of the Declaration of Philip Hunt and Rosco Maunder dated November 4, 2022 filed in the 225 Action.

6. Attached as Exhibit 4 is a true and correct copy of excerpts of the Remote Deposition of Arthur Leonard Robert Morton dated November 11, 2022.

7. Attached as Exhibit 5 is a true and correct copy of the Certificate of Service re Summons and Complaint, dated August 22, 2023 [AP Docket No. 3].

8. Attached as Exhibit 6 is a true and correct copy of the Certificate of Service re Summon and Complaint, dated August 30, 2023, filed on September 15, 2023 [AP Docket No. 14].

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 13th day of November, 2023, in Wilmington, DE.

/s/ Steven L. Caponi
Steven L. Caponi (No. 91881)

CERTIFICATE OF SERVICE

I, Steven L. Caponi, certify that on November 13, 2023 I caused a copy of the forgoing *Declaration of Steven L. Caponi in Support of Defendants Hawk Investment Holdings Limited and Arthur Leonard Robert Morton's Motion to Dismiss Plaintiffs' Complaint for Lack of Personal Jurisdiction, Failure to Obtain Service, and Failure to State a Claim* to be served on those persons receiving notice through CM/ECF.

/s/ Steven L. Caponi
Steven L. Caponi (No. 91881)